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Attorneys for Defendant Ford Motor Company

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SIGNAL IP, INC., a California corporation,

Plaintiff,
v.

FORD MOTOR COMPANY, a
Delaware corporation,

Defendant.

Case No. 2:14-cv-03106- JAK-JEM

**DEFENDANT'S NOTICE OF
MOTION AND MOTION TO
TRANSFER**

Judge: Hon. John A. Kronstadt
Courtroom: Roybal 750 - 7th Floor

Action Filed: April 23, 2014
Trial Date:

Hearing Date: November 3, 2014
Time of Hearing: 8:30 AM

1 **PLEASE TAKE NOTICE** that on November 3, 2014, at 8:30 AM, or as
 2 soon thereafter as counsel may be heard before the Honorable John A. Kronstadt,
 3 in Courtroom 750 of the United States District Court, Central District of
 4 California, located at 255 East Temple Street, Los Angeles, California, defendant
 5 Ford Motor Company will move and hereby does move this Court for transfer of
 6 venue to the Eastern District of Michigan.

7 This is a patent infringement lawsuit directed at vehicles designed by Ford
 8 Motor Company (“Ford”) in the Eastern District of Michigan. In stark contrast,
 9 Plaintiff Signal IP, Inc. (“Signal IP”) was formed in California only weeks before
 10 the commencement of suit. Signal IP does not have any evidence or witnesses
 11 located in this forum that are material to this patent infringement lawsuit against
 12 Ford. Through a series of recent transactions, Signal IP acquired the asserted
 13 patents on March 27, 2014 through its parent company Marathon Patent Group,
 14 headquartered in Virginia. In December 2013, Marathon acquired the patents from
 15 their original owner, Delphi Technologies, Inc. f/k/a Delco Electronics. Delphi’s
 16 headquarters is located in the Eastern District of Michigan.

17 Signal IP asserts six different patents against six completely different and
 18 complex vehicle technologies on over thirty different Ford vehicles. The relevant
 19 Ford engineers, Ford’s relevant third-party suppliers, and their respective
 20 documents are primarily located in Eastern District of Michigan. None of the
 21 information relevant to Signal IP’s various infringement claims is located in this
 22 District.

23 Therefore, Ford requests pursuant to 28 U.S.C. § 1404(a) that this matter be
 24 transferred to the Eastern District of Michigan where Ford has its headquarters and
 25 central operations, where the accused products were developed, and where key
 26 witnesses and evidence are located. The accompanying brief in support sets forth
 27 in greater detail the factual and legal bases for the relief requested in this motion.
 28

Local Rule 7-3 Certification

This motion is made following the meet and confer efforts made by counsel pursuant to L.R. 7-3, which took place on July 2, 2014.

This motion is based upon this Notice of Motion and Motion, the accompanying Memorandum of Points And Authorities, the statement of Uncontroverted Facts and Conclusions of Law, and the Declaration of Amy Leshan, including all exhibits, all filed concurrently herewith, and upon such other documentary and oral evidence that may be presented at the hearing.

Dated: August 14, 2014 Respectfully submitted,

By: /s/ John S. LeRoy
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